

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	CRIMINAL NO.: 3: 18 CR 225
	)	
Plaintiff,	)	
	)	JUDGE JACK ZOUHARY
vs.	)	MAGISTRATE JAMES R. KNEPP
	)	
	)	
JARED J. DAVIS,	)	
	)	
Defendant.	)	
	)	

**MOTION FOR RELEASE  
OF DOCUMENTS**

Now comes the Defendant, Jared J. Davis, by and through undersigned counsel, Friedman & Nemecek, L.L.C., and hereby makes the instant Motion for the Release of Documents. Specifically, Mr. Davis is requesting that Documents #46, which is currently filed under seal, be released into his possession. In support thereof, counsel avers the following:

1. On or about November 30, 2018, Defendant filed a Motion to Modify Conditions of Release i.e. Secured Bond. (Doc. #45). In the motion, Defendant requested that this Honorable Court release fifteen (15) properties that were secured as bond.
2. As part of said filing, Defendant attached Exhibit D, which contained a full list of the properties in which Defendant was requesting to be released. (Doc. #46). However, due to the sensitive nature of the information contained therein, i.e. addresses, the exhibit was filed under seal with permission of the Court. (Doc. #44, 46).
3. On or about December 21, 2018, this Honorable Court granted Defendant's request to release the properties contained in Exhibit D of his above-referenced Motion. (Doc. #47).
4. Recently, one of the properties that was released via the Court's December 21, 2018 ruling

was sold by Defendant. The sale is expected to have a closing date of March 15, 2021.

5. In order for the sale to be finalized, Defendant must provide proof of marketable title. Currently, the property in question has a lien as a result of Defendant's bond. As such, the County Recorder is requesting that Defendant provide proof that the property in question was released by this Honorable Court. To satisfy this requirement, Defendant is expected to provide certified copies of the Order which granted release (Doc. #47), and the list of properties released (Doc. #46).

6. As stated above, Doc. #46 has been filed under seal, and is therefore not obtainable outside an Order from this Honorable Court. Accordingly, Defendant stands before this Honorable Court and requests that an Order be issued, thereby releasing Document #46 to Defendant.

**WHEREFORE**, the Defendant, Jared J. Davis, hereby respectfully requests that the Court issue an Order releasing Document #46, which is currently under seal, so that he may move forward with the sale of the previously released property.

Respectfully submitted,

Dated: March 5, 2021

/s/ Ian N. Friedman  
IAN N. FRIEDMAN (0068630)  
MADELYN J. GRANT (0098165)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice was filed by CM/ECF on the 5th day of March, 2021, which will send a notification of such filing electronically to the following: Segev Phillips, Assistant United States Attorney, 801 Superior Avenue, Cleveland, Ohio 44113.

Respectfully submitted,

/s/ Ian N. Friedman  
IAN N. FRIEDMAN  
MADELYN J. GRANT  
ERIC C. NEMECEK  
Counsel for Defendant